

**IN THE UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF PENNSYLVANIA**

JILL STEIN AND RANDALL REITZ,	:	CIVIL ACTION
	:	
Plaintiffs,	:	
	:	
v.	:	NO. 16-CV-06287
	:	
PEDRO A. CORTÉS, <i>et al.</i> ,	:	
	:	
Defendants,	:	
	:	
and	:	
	:	
President-Elect Donald Trump, <i>et al.</i> ,	:	
	:	
Defendant-Intervenors.	:	

ORDER

AND NOW, this ____ day of _____ 2017, upon consideration of the Defendant-Intervenors' Motion to Withdraw and any response thereto, it is hereby ORDERED that the Defendant-Intervenors' Motion to Withdraw is GRANTED.

BY THE COURT:

Paul S. Diamond, J.

**IN THE UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF PENNSYLVANIA**

JILL STEIN AND RANDALL REITZ,	:	CIVIL ACTION
	:	
Plaintiffs,	:	
	:	
v.	:	NO. 16-CV-06287
	:	
PEDRO A. CORTÉS, <i>et al.</i> ,	:	
	:	
Defendants,	:	
	:	
and	:	
	:	
President-Elect Donald Trump, <i>et al.</i> ,	:	
	:	
Defendant-Intervenors.	:	

MOTION TO WITHDRAW FILED BY INTERVENORS PRESIDENT-ELECT DONALD TRUMP; VICE-PRESIDENT-ELECT MICHAEL PENCE; ALL OF THE PENNSYLVANIA ELECTORS OF PRESIDENT-ELECT DONALD TRUMP AND VICE-PRESIDENT-ELECT MICHAEL PENCE; DONALD J. TRUMP FOR PRESIDENT, INC.; AND THE REPUBLICAN PARTY OF PENNSYLVANIA

Intervenors President-Elect Donald Trump, Vice-President-Elect Michael Pence, all of the Pennsylvania Electors of President-Elect Donald Trump and Vice-President-Elect Michael Pence, Donald J. Trump for President, Inc. and the Republican Party of Pennsylvania (hereafter “Intervenors”), by and through undersigned counsel, hereby move to withdraw as a party from this matter and state as follows:

1. This Court permitted Intervenorors to intervene pursuant to Rule 24 of the Federal Rules of Civil Procedure. (See Document No. 22)

2. As set forth in their Motion to Intervene, Intervenorors' interest in this matter was in response to the Plaintiffs' challenge to the constitutionality of the Pennsylvania voting system and Election Code, which potentially, imminently, and adversely impacted President-Elect Donald Trump and Vice-President-Elect Michael Pence's win in Pennsylvania, the election of the Pennsylvania Electors of President-Elect Donald Trump and Vice-President-Elect Michael Pence (the "Electors"), and the time-sensitive certification of the Electors by the Governor of Pennsylvania in accordance with the Federal Safe Harbor pursuant to 3 U.S.C. §5.

3. After the Hearing held on Plaintiffs' requested injunctive relief, this Honorable Court issued a Memorandum and Order on December 12, 2016, denying Plaintiffs' request for relief. (See Document Nos. #55 and #56)

4. As a result of the issuance of that Memorandum and Order, the Governor was able to certify the Electors on December 13, 2016 in accordance with the Federal Safe Harbor pursuant to 3 U.S.C. §5.

5. The Electoral College was held on December 19, 2016 as required by law, and the Pennsylvania Electors cast their votes in favor of President-Elect Donald Trump and Vice-President-Elect Michael Pence.

6. President -Elect Donald Trump and Vice-President-Elect Michael Pence won the nationwide Electoral College vote.

7. Since the Electoral College has met and voted, Intervenors no longer have an interest in this litigation.

8. Courts allow intervention and withdrawal when it does not interfere with the proceedings.

9. Intervenors withdrawal from this matter will not negatively impact the proceedings.

10. Intervenors sent a copy of this Motion to Withdraw to counsel for the other parties. Counsel for the Plaintiffs do not oppose the relief requested herein. The Intervenors have yet to receive a response from counsel for the Defendants.

WHEREFORE, Intervenors respectfully request the Court issue an Order granting their requested relief and allowing them to withdraw from this action.

Respectfully submitted,

/s/ Lawrence J. Tabas

Lawrence J. Tabas, I.D. No. 27815

OBERMAYER REBMANN MAXWELL & HIPPEL LLP

Centre Square West

1500 Market Street, Suite 3400

Philadelphia, PA 19102

Phone: 215-665-3158

Email: lawrence.tabas@obermayer.com

/s/ Rebecca L. Warren

Rebecca L. Warren, I.D. No. 63669
OBERMAYER REBMANN MAXWELL & HIPPEL LLP
Centre Square West
1500 Market Street, Suite 3400
Philadelphia, PA 19102
Phone: 717-221-1602
Email: rebecca.warren@obermayer.com

/s/ Chad Readler*

Chad A. Readler
JONES DAY
325 John H. McConnell Blvd., Suite 600
Columbus, OH 43215
Phone: 614-469-3939
careadler@jonesday.com
*admitted *pro hac vice*

/s/ David M. Morrell*

David M. Morrell
JONES DAY
51 Louisiana Avenue, N.W.
Washington, D.C. 20001
Phone: (202) 879-3717 (direct)
Email: dmorrell@jonesday.com
*admission *pro hac vice*

Donald F. McGahn II I.D. No. 73796
JONES DAY
51 Louisiana Avenue, N.W.
Washington, D.C. 20001
Phone: (202) 879-3748 (direct)
Email: dmcgahn@jonesday.com

Dated: January 9, 2017

CERTIFICATE OF SERVICE

I hereby certify that a true and correct copy of the foregoing Proposed Order and Motion to Withdraw were electronically filed with the Clerk of Court on January 9, 2017 using CM/ECF, which will send notification of such filing to counsel of record.

Respectfully submitted,

/s/ Lawrence J. Tabas

Lawrence J. Tabas, I.D. No. 27815
OBERMAYER REBMANN MAXWELL & HIPPEL LLP
Centre Square West
1500 Market Street, Suite 3400
Philadelphia, PA 19102
Phone: 215-665-3158
Email: lawrence.tabas@obermayer.com

/s/ Rebecca L. Warren

Rebecca L. Warren, I.D. No. 63669
OBERMAYER REBMANN MAXWELL & HIPPEL LLP
Centre Square West
1500 Market Street, Suite 3400
Philadelphia, PA 19102
Phone: 717-221-1602
Email: rebecca.warren@obermayer.com

/s/ Chad Readler*

Chad A. Readler
JONES DAY
325 John H. McConnell Blvd., Suite 600
Columbus, OH 43215
Phone: 614-469-3939
careadler@jonesday.com
*admitted *pro hac vice*

/s/ David M. Morrell*

David M. Morrell

JONES DAY

51 Louisiana Avenue, N.W.

Washington, D.C. 20001

Phone: (202) 879-3717 (direct)

Email: dmorrell@jonesday.com

*admission *pro hac vice*

Donald F. McGahn II, I.D. No. 73796

JONES DAY

51 Louisiana Avenue, N.W.

Washington, D.C. 20001

Phone: (202) 879-3748 (direct)

Email: dmcgahn@jonesday.com

Dated: January 9, 2017